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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	:	Chapter 11 Case No.
	:	08-13555 (SCC)
LEHMAN BROTHERS HOLDINGS INC., et al.,	:	(Jointly Administered)
Debtors.	:	
	:	
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**MOTION OF SRM GLOBAL MASTER FUND LIMITED PARTNERSHIP
FOR LEAVE TO FILE UNDER SEAL**

SRM Global Master Fund Limited Partnership (“SRM”), by and through its undersigned counsel, hereby files this motion (the “Motion”) seeking leave of the Court, pursuant to section 107(b) of the Bankruptcy Code and Rule 9018 of the Federal Rules of Bankruptcy Procedure: (a) to file under seal (i) *SRM Global Master Fund Limited Partnership’s Limited Objection to Plan Administrator’s Motion to Estimate Claims for Reserve and Distribution Purposes* (the “SRM Limited Objection”) and (ii) the *Declaration of Richard A. Graham in Support of SRM Global Master Fund Limited Partnership’s Limited Objection to Plan Administrator’s Motion to Estimate Claims for Reserve and Distribution Purposes* (the “Graham Declaration,” and together with the SRM Limited Objection, the “Pleadings”); and (B) to file on the Court’s electronic docket for these chapter 11 cases a version of each Pleading that redacts certain sensitive

commercial information included therein. In support of the Motion, SRM respectfully states as follows:

BACKGROUND

1. On September 15, 2008 (the “Petition Date”), LBHI filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “Bankruptcy Code”).

2. On June 10, 2015, LBHI, as Plan Administrator filed the *Motion of Plan Administrator Pursuant to Sections 8.4, 9.3, and 14.1 of the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors to Estimate Claims for Reserve and Distribution Purposes* [Docket No. 49954] (the “Estimation Motion”).

3. SRM plans to file the Pleadings in support of its opposition to the Estimated Motion. The Pleadings contain certain sensitive commercial information, including, among other things, reference to the existence and terms of an agreement that SRM is contractually required to keep confidential and is not presently permitted to disclose publicly.

RELIEF REQUESTED

4. By this Motion, SRM requests entry of an order authorizing SRM, pursuant to section 107(b) of the Bankruptcy Code and Rule 9018 of the Federal Rules of Bankruptcy Procedure: (A) to file under seal the Pleadings; and (B) to file on the Court’s electronic docket for these chapter 11 cases a version of each Pleading that redacts certain sensitive commercial information included therein.

BASIS FOR RELIEF

5. Section 107(b) of the Bankruptcy Code provides that “[o]n request of a party in interest, the bankruptcy court shall . . . protect an entity with respect to a trade secret or

confidential research, development, or commercial information.” 11 U.S.C. § 107(b). In addition, Rule 9018 of the Federal Rules of Bankruptcy Procedures provides that “[o]n motion or on its own initiative, with or without notice, the court may make any order which justice requires . . . to protect the estate or any entity in respect of a trade secret or other confidential research, development or commercial information.” Fed. R. Bankr. P. 9018(1). These provisions are designed to protect “business entities from disclosure of information that could reasonably be expected to cause the entity commercial injury.” See In re Global Crossing, Ltd., 295 B.R. 720, 725 (Bankr. S.D.N.Y. 2003).

6. The Pleadings include “commercial information” that, if disclosed, could cause commercial injury to SRM and other parties involved in this case. For instance, copies of certain confidential agreements are included as attachments to the Graham Declaration, and some of the terms of those agreements are described in the SRM Limited Objection. By the terms of such agreements, SRM is not presently permitted to disclose such agreements, their existence, or their terms publicly. See generally Graham Declaration, Exhibits C (at article 11) and D (at article 10). Moreover, no party in interest would be prejudiced if the relief requested were granted. Accordingly, SRM respectfully requests that the Court grant the requested relief.

NOTICE

7. Notice of this Motion will be served on the Plan Administrator and the Office of the United States Trustee for Region 2.

8. No prior request for the relief sought in this Motion has been made to this or any other court.

CONCLUSION

For the foregoing reasons, SRM respectfully requests that the Court enter an order in the form attached hereto as Exhibit A, authorizing SRM to file the Pleadings under seal and to file on the Court's electronic docket for these chapter 11 cases a version of each Pleading that redacts certain sensitive commercial information included therein and granting such other relief that the Court may deem appropriate.

Dated: July 10, 2015
New York, New York

Respectfully submitted,

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